

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Case No.: 1:19-CR-00018-ABJ

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROGER J. STONE, JR.,

Defendant.

**DEFENDANT ROGER STONE'S RESPONSE TO FEBRUARY 27, 2019
ORDER OF THE COURT**

In response to the Court's Order of February 27, 2019, Defendant Roger Stone advises the following:

The Court instructed the defendant to advise whether he intends to file any motions pursuant to Fed. R. Crim. P. 12(b)(3)(A), (B), (C). Roger Stone, through counsel, intends to file motions pursuant to those rules of criminal procedure.

The Court is inquiring about the nature and number of motions. While the defendant cannot say with specificity or certainty at this point in the proceedings, the defendant and counsel can advise that we may file a motion regarding selective or vindictive prosecution. *See* Fed. R. Crim. P. 12(b)(3)(A)(iv). We may file a motion to dismiss regarding error in the grand-jury proceeding. *See* Fed. R. Crim. P. 12(b)(3)(A)(v).

Counsel for Defendant may file one or more motions to suppress, pursuant to *See* Fed. R. Crim. P. 12(b)(3)(C).

The defense's ediscovery vendor identified approximately 2.23 million pages of "Load Ready" data provided by the government, including the "Hot Documents" identified, without warranty, by the government. There is approximately another 4.5 Terabytes of "Non-Load" ready data provided by the government that is in the process of being filtered and prepared for review.

It is difficult to anticipate the number of motions relating to discovery, suppression, or other issues at this point.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 7, 2019, I electronically filed the foregoing with the Clerk of Court using CM/ECF. I also certify that the foregoing is being served this day on all counsel of record or pro se parties, via transmission of Notices of Electronic Filing generated by CM/ECF.

BUSCHEL GIBBONS, P.A.

_____/s/ Robert Buschel_____
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